

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**SECURITIES AND EXCHANGE COMMISSION, : X**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC # \_\_\_\_\_  
DATE FILED: 6/12/2019

**Plaintiff, : :**

**- against - : :**

**BARRY C. HONIG, MICHAEL BRAUSER, :  
JOHN STETSON, JOHN R. O'ROURKE III, :  
ROBERT LADD, ELLIOT MAZA, BRIAN KELLER, :  
JOHN H. FORD, ATG CAPITAL LLC, GRQ :  
CONSULTANTS, INC., HS CONTRARIAN :  
INVESTMENTS, LLC, GRANDER HOLDINGS, INC., :  
and STETSON CAPITAL INVESTMENTS INC., :  
: :**

**Defendants. : :**

**18 Civ. 8175 (ER)**

**ECF CASE**

**STIPULATION AND [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for Defendant Robert Ladd and Plaintiff Securities and Exchange Commission (“Commission”), that any and all discovery obtained by Defendant Ladd pursuant to his Rule 34 Document Request to the Commission (the “Discovery Material”) shall be retained by him in confidence and shall not be disclosed to or shared with (i) any other Defendant in this matter who (x) declines to produce documents in response to the Commission’s Rule 34 Document Request to him by reason of his assertion of an act of production privilege or any other assertion of his Fifth Amendment privileges, or by reason of his obtaining an extension from the Commission on his time to respond; or (y) has not executed the Confidentiality Stipulation and Order entered by the Court;

and (ii) any entity controlled by any such Defendant. Nothing herein shall preclude Ladd from disclosing such Discovery Material as part of a public filing made by Ladd in this matter.

Dated: New York, New York  
May 22, 2019

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ROBERT LADD

SECURITIES AND EXCHANGE  
COMMISSION

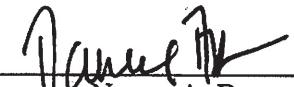
By:



Cooley LLP  
1333 2nd Street, Suite 400  
Santa Monica, CA 90401  
310-883-6485

Attorneys for Defendant Robert Ladd

By:



Nancy A. Brown

200 Vesey Street  
Suite 400  
New York, NY 10281  
212-336-1023

Attorneys for Plaintiff Securities and Exchange  
Commission

So Ordered:



UNITED STATES DISTRICT JUDGE

Dated: 6/12/2019